C. Remarks

The claims are 1-28, with claims 1, 17, 20, 22, 25, 26 and 28 being independent. Each of claims 1, 17, 20, 22, 25, 26 and 28 have been amended to clarify the invention. In particular, the claims have been amended to make it more clear that plural ink materials of different colors for forming the secondary color are applied to respective positions within a pixel area and that the orders of application of the plural ink materials of different colors are changed for the respective positions within the pixel area. The amendments are supported by the application as filed; Applicants submit that no new matter has been added. Reconsideration of the present claims is respectfully requested.

Claims 1-5, 9-17, 20, 22 and 24 stand rejected under 35 U.S.C. §102(e) as being anticipated by Askeland (U.S. Patent No. 6,254,217). Claims 25-28 stand rejected under 35 U.S.C. §103(a) as being obvious over Askeland in view of Mizutani (U.S. Patent No. 5,774,146). Claims 6-8, 18, 19, 21 and 23 stand rejected under 35 U.S.C. §103(a) as being obvious over Askeland in view of Matsufuji (U.S. Patent No. 4,593,295). Applicants respectfully traverse these rejections.

At the outset, Applicants would like to thank the Examiner for the courtesies extended during the interview conducted on July 7, 2005. As noted in the Interview Summary, Applicants' attorney and the Examiner discussed the Askeland reference. In particular, it was agreed that Askeland does not teach changing the order of ink to a particular position within a unit pixel area. It was further agreed that the claims should be amended to make the distinction more clear. Accordingly, Applicants have now amended each of claims 1, 17, 20, 22, 25, 26 and 28 in that regard. Askeland's deficiency

in terms of its failure to disclose a critical feature of the present invention - changed order of ink application within a pixel - is now more clear.

Mizutani does not remedy the deficiencies of Askeland; there is no disclosure of changing the order of application of inks of plural colors to a <u>particular</u> pixel area to address hue unevenness therein. Mizutani merely discloses that a RAM is utilized as a general print buffer. The present invention, additionally by contrast, is characterized in that data are stored into a plurality of buffers and the buffers are selectively used so as to change the order of the application of inks. Mizutani is silent in that regard.

Matsufuji does not remedy the deficiencies of Askeland either; there is no disclosure of changing the order of application of inks of plural colors to a <u>particular</u> pixel area to address hue unevenness therein. Matsufuji shows recording heads in which color arrangement is symmetric. However, in Matsufuji, dots are recorded by different orders of application of inks regularly according to a determined pattern. At best, the combination of Matsufuji and Askeland suggest an apparatus that records dots of composite color different in color overlapping order onto positions determined by arrangement of nozzles of a recording head or dots of composite color different in color overlapping order onto positions determined by forward and rearward print patterns.

In sum, it is clear that the present invention is not anticipated or rendered obvious by any of Askeland, Mizutani and Matsufuji, whether those references are considered alone or in some combination. There is simply no disclosure or suggestion of at least one key feature of the presently claimed invention - changing the order of application of inks of plural colors to a <u>particular</u> pixel area to address hue unevenness. Accordingly, Applicants respectfully request withdrawal of the prior art rejections.

This Amendment After Final Rejection is believed clearly to place this application in condition for allowance. Its entry is therefore believed proper under 37 C.F.R. §1.116. Accordingly, entry of this Amendment After Final Rejection, as an earnest attempt to advance prosecution, is respectfully requested. Should the Examiner believe that issues remain outstanding, the Examiner is respectfully requested to contact Applicants' undersigned attorney in an effort to resolve such issues and advance the case to issue.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

Elizabeth F. Holowacz Attorney for Applicants

Registration No. 42,667

FITZPATRICK, CELLA, HARPER & SCINTO 30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200

NY_MAIN 528056v1